



U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

13.6 PHYSICAL SECURITY

REVIEW RESPONSIBILITIES

Primary - ~~Physical Security Licensing Branch, Division of Safeguards, NMSS Safeguards Branch (PSGB)~~¹

Secondary - ~~Standardization & Special Projects Branch, Division of Licensing, NRR~~ None²

I. AREAS OF REVIEW

~~At the~~For preliminary safety analysis report (PSAR) ~~reviews stage, the review of~~³ this section covers plans for implementing security measures relating to (1) preemployment of personnel employed to work at the proposed plant and (2) the layout of the plant and other design features and equipment arrangements intended to provide protection of vital equipment against acts of radiological sabotage in accordance with 10 CFR Part 73, §73.55.

For design certifications, the review involves the evaluation of the physical security system design, as set forth in the standard safety analysis report, to prevent or mitigate acts of radiological sabotage. These reviews include evaluation of vital equipment designations and protection, and proposed access control measures.⁴

~~At the~~For reviews of final safety analysis reports (FSAR) ~~stage, and applications referencing a~~ certified design,⁵ the review involves the evaluation of the physical security plan, the ~~G~~uard ~~T~~training and ~~Q~~ualification ~~P~~plan⁶, and the safeguards ~~E~~contingency ~~P~~plan⁷ which collectively describes⁸ a comprehensive physical security program for the plant site. The review encompasses the physical security organization, access controls to the plant protected and vital areas including physical barriers, searches of personnel and packages and means of detecting unauthorized intrusions, provisions for monitoring the access to vital equipment, selection of

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USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

personnel for security purposes, communications systems for security, intrusion alarm systems, arrangements with law enforcement authorities for assistance in responding to security threats, training of security personnel and response to contingencies. The implementation schedule for the physical security program is reviewed, including phases for a multi-unit plant where applicable.

Specific information to be reviewed, referenced to applicable sections of 10 CFR Part 73, §73.55, including 10 CFR Part 73, Appendices B and C, include the following:

1. Clear diagrams, to approximate,⁹ scale, displaying the following:
 - a. Designated protected and vital areas of the plant site, including physical barriers.
 - b. The locations of alarm stations.
 - c. The locations of access control points to protected and to vital areas.
 - d. The locations of parking lots relative to the clear areas adjacent to the physical barriers surrounding protected areas.
 - e. Special features of the terrain which may present special vulnerability problems.
 - f. The location of relevant law enforcement agencies and their geographical jurisdictions.
 - g. The interaction of plant operations with the security program.
- 2.¹⁰ The response capabilities of local law enforcement agencies, including estimates of the number of officers that can arrive at the plant site in the event of a security threat after receipt of a call for assistance. (This response capability bears upon the adequacy of the size of the onsite guard force.)

~~Secondary responsibilities will be conducted by SSPB to assure balance between safety and safeguards.¹¹~~

Review Interfaces:

The PSGB will coordinate other branches' evaluations that interface with the overall review of the system as follows:¹²

1. The Quality Assurance and Maintenance Branch (HQMB) reviews the initial testing of physical security systems as part of its primary review responsibility for SRP Section 14.2.¹³
2. The Instrumentation and Controls Branch (HICB) reviews those aspects of the security communication system design that are not addressed by this SRP section, including the potential for interference with plant equipment and operations, as part of its primary review responsibility for SRP Section 9.5.2.¹⁴
3. The Probabilistic Safety Assessment Branch (SPSB) reviews the plant probabilistic risk assessment (PRA) and related severe accident vulnerabilities, including those associated with sabotage events, as part of its primary review responsibility for SRP Section 19.1 (proposed).¹⁵

II. ACCEPTANCE CRITERIA

The physical security program for the facility is acceptable if the various elements of the program, including the physical security plan, the guard training and qualification plan, and the safeguards contingency plan are in accordance with the following:¹⁶

- A. 10 CFR Part 25, "Access Authorization for Licensee Personnel." (if applicable)
- B. 10 CFR Part 26, "Fitness for Duty Programs."¹⁷
- C. 10 CFR Part 50, §50.34(c), "Physical Security Plan."
- D. 10 CFR Part 50, §50.34(d), "Safeguards Contingency Plan."¹⁸
- E. 10 CFR Part 50, §50.54(p), with regard to safeguard contingency plan procedures.¹⁹
- F. 10 CFR Part 73, §73.21, "Requirements for the Protection of Safeguards Information."²⁰
- G. 10 CFR Part 73, §73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage."
- H. 10 CFR Part 73, §73.56, "Personnel Access Authorization Requirements for Nuclear Power Plants."²¹
- I. 10 CFR Part 73, §73.57, "Requirements for Criminal History Checks of Individuals Granted Unescorted Access to a Nuclear Power Facility or Access to Safeguards Information by Power Reactor Licensees."²²
- J. 10 CFR Part 73, Appendix B, "General Criteria for Security Personnel."
- K. 10 CFR Part 73, Appendix C, "Licensee Safeguards Contingency Plans."
- L. 10 CFR Part 75, "Safeguards on Nuclear Material-Implementation of US/IAEA Agreement." (if applicable)
- M. 10 CFR Part 95, "Security Facility Approval and Safeguarding of National Security Information and Restricted Data." (if applicable)

Specific criteria necessary to meet the relevant requirements of the Commission's regulations listed above are as follows:²³

- 1.²⁴ ~~At the For PSAR stage reviews~~²⁵, preliminary planning for physical security is considered acceptable if it provides reasonable assurance that conformance to the applicable provisions of ~~10 CFR Part 73, §73.55~~ the acceptance criteria listed above are expected to be achieved, including. Additional criteria includes the following:²⁶

1. ~~10 CFR Part 73, §73.55 in its entirety and Part 73 Appendices B and C~~

2. ~~10 CFR Part 25 and 10 CFR Part 95 (if applicable)~~²⁷

- 6a.²⁸ 10 CFR Part 50, §50.70(b)(3) with regard to unfettered access to the facility by NRC inspectors.²⁹
- 7b. Regulatory Guide 5.12 with regard to the use of locks in physical barriers to assist in controlling access to areas, facilities, and materials.³⁰
- 3c. Regulatory Guide 5.44 with regard to the performance and use of perimeter intrusion alarm systems.³¹
- 5d. ~~ANSI N18.17, Paragraph 4.3 Employee Screening~~ Regulatory Guide 5.66 as it applies to screening and authorization of access for employees.³²
- 4e. NUREG-0674 (Reference 20) as it applies to the review of guard training and qualification plans developed in accordance with the requirements of 10 CFR 73, Appendix B.³³

8. ~~Regulatory Guide 5.20~~³⁴

- f. NUREG-0908 (Reference 21) as it applies to acceptance criteria for the evaluation of nuclear power reactor security plans.³⁵

To be considered acceptable, this planning should include commitment to design phase review for physical security and should show how, to the satisfaction of the staff, this responsibility is to be implemented by the applicant.

2. ~~At the For FSAR stage reviews~~³⁶, the applicant's security plan is considered acceptable if it conforms to the requirements of ~~10 CFR Part 50, §50.34(c), 10 CFR Part 73, §73.55 and 10 CFR Part 73, Appendix B and Appendix C. If applicable, 10 CFR Parts 25, 75, and 95 must be addressed~~ of acceptance criteria II.A through II.M.³⁷ In addition, the requirements and recommendations of ANSI N18.17³⁸ (Reference 27)³⁹ establish the basis for an adequate security plan for the protection of nuclear power plants against radiological sabotage.

~~Specific acceptance criteria, including s~~Staff⁴⁰ positions, regarding some of the more general requirements of 10 CFR Part 73, §73.55 and Part 73, Appendices B and C are as follows:

- a. Section b of §73.55 - Physical security organization. The licensee shall establish a security organization, including guards, to protect ~~his~~the⁴¹ facility against radiological sabotage. Security personnel, including guards, shall comply with the requirements of 10 CFR Part 73, Appendix B, = "General Criteria for Security Personnel." These general criteria establish requirements for the selection, training, equipping, testing, and qualification of individuals who will be responsible for the protecting of special nuclear materials, nuclear facilities, and nuclear shipments.⁴² Additional guidance and criteria relevant to the physical

security organization and the training and qualification of security personnel is provided in NUREG-0674 and NUREG-0908.⁴³

- b. Section c of §73.55 - Physical Barriers. The licensee shall locate vital equipment only within a vital area, which, in turn, shall be located within a protected area such that access to vital equipment requires passage through at least two physical barriers as defined in 10 CFR 73.2. Vital area barriers should meet Regulatory Guide 5.65, Positions C.1 and C.2. Locking devices utilized in physical barriers should be applied in accordance with Regulatory Guide 5.12. Isolation zones adjacent to the protected area perimeter shall also be provided. Isolation zone and protected area lighting shall meet the requirements of 10 CFR 73.55(c) including the interpretations in 10 CFR 8.5(b) and (c). Means to detect penetration or attempted penetration should be provided in the isolation zone and protected area in accordance with Regulatory Guide 5.44. The reactor control room perimeter boundaries shall be bullet resisting. Vehicle control measures shall be established in accordance with the requirements of 10 CFR 73.55(c)(7), and Regulatory Guide 5.68. Additional criteria and guidance is provided in Section 4 of NUREG-0908.⁴⁴
- c. Section d of §73.55 - Access Requirements. The licensee shall control all points of personnel and vehicle access into a protected area. Identification and search of all individuals, packages, and vehicles⁴⁵ shall be made and authorization shall be checked at such points. Access authorization systems shall be designed to accommodate the rapid ingress and egress of authorized individuals and vehicles during emergency conditions or situations that could lead to emergency conditions. The access authorization systems shall ensure vital area access is controlled during nonemergency conditions through individual access authorizations which are periodically reviewed; through maintenance of positive control over vital area access for authorized individuals; and by locking and alarming unoccupied vital areas. Locking devices, including keys and combinations, related to access control to protected and vital areas should be controlled. Records, in accordance with 10 CFR 73.70(d), shall document the vital area entry and exit of individuals. Regulatory Guide 5.65 provides additional guidance relevant to vital area access during emergency and nonemergency conditions. Regulatory Guides 5.12 and 5.65 provide guidance relative to the use and control of locks, keys, and combinations. Additional criteria and guidance is provided in Section 5 of NUREG-0908.⁴⁶
- d. Section e of §73.55 - Detection Aids. All alarms required pursuant to this part shall annunciate in a continuously manned central alarm station located within the protected area and in at least one other continuously manned station, not necessarily onsite, such that a single act cannot remove the capabilities of calling for assistance or otherwise responding to an alarm. The central alarm station shall be considered a vital area, shall be bullet resisting, the interior shall not be visible from the protected area perimeter, and associated onsite secondary power supplies for alarm annunciators and non-portable communication equipment must be located within vital areas. All emergency exits from protected and vital areas

shall be alarmed. Alarm devices and transmission lines must be tamper indicating and self checking. Regulatory Guides 5.44 and 5.65 provide additional guidance relevant to perimeter intrusion and vital area alarm systems, respectively. Regulatory Guide 5.12 provides guidance regarding the use of alarms with electric locking devices. Additional criteria and guidance is provided in Section 6 of NUREG-0908.⁴⁷

- e. Section f of §73.55 - Communication Requirements. Each guard, watchman or armed response individual, or any other individual performing an active security function on duty,⁴⁸ shall be capable of maintaining continuous communications with an individual in each continuously manned alarm stations. Conventional telephone and radio or microwave transmitted two-way voice communications shall be established with local law enforcement authorities. Additional criteria and guidance is provided in Section 7 of NUREG-0908.⁴⁹
- f. Section g of §73.55 - Testing and Maintenance. Each licensee shall test and maintain intrusion alarms, emergency alarms, communications equipment, access control equipment, physical barriers, and other security-related devices or equipment. Intrusion alarms should be tested in accordance with guidance in Regulatory Guide 5.44.⁵⁰

In addition to security system testing and maintenance requirements, licensees shall independently audit the continued effectiveness of the overall security program per the requirements of 10 CFR 73.55(g)(4) and 10 CFR 50.54(p)(3), and the access authorization and fitness for duty programs in accordance with 10 CFR 73.56(g) and 10 CFR 26.80 respectively. Reviews of the interface between the security program and safe operation of the facility should be addressed in accordance with the requirements of 10 CFR 73.55(d)(7)(ii)(B) and the guidance contained in Position C.6 of Regulatory Guide 5.65. Additional criteria and guidance is provided in Section 8 of NUREG-0908.⁵¹

- g. Section h of §73.55 - Response Requirements. The licensee shall establish, maintain, and follow an approved safeguards contingency plan. The licensee shall maintain liaison with local law enforcement authorities. Each licensee shall maintain an adequate number of guards for response and assessment of possible security threats. Each licensee shall require that those guards the security organization take steps to evaluate and neutralize the threat when detected with sufficient force to counter the force of the threat and to protect the health and safety of the public. The licensee shall provide a means to observe the isolation zones and physical barrier at the perimeter of the protected area.⁵²
- h. ~~Part 73, Appendix B - General Criteria for Security Personnel. These general criteria establish requirements for the selection, training, equipping, testing, and qualification of individuals who will be responsible for the protecting of special nuclear materials, nuclear facilities, and nuclear shipments.⁵³~~

fh.⁵⁴ Part 73, Appendix C - Licensee Safeguards Contingency Plans. A licensee safeguards contingency plan is a documented plan to give guidance to licensee personnel in order to accomplish specific defined objectives in the event of threats, thefts, or radiological sabotage relating to special nuclear material or nuclear facilities licensed under the Atomic Energy Act of 1954, as amended. The safeguards contingency plan, including procedures and provisions for independent annual audits, shall be established as a condition of the license in accordance with the requirements of 10 CFR 50.54(p). Regulatory Guide 5.54 provides guidance with regard to the acceptable format and content of a safeguards contingency plan. Regulatory Guide 5.65, Position C.6.1, provides guidance relative to the periodic review of security and contingency plans. The plan should identify the individual responsible for suspending safeguards measures during emergencies in accordance with 10 CFR 73.55(a) and Regulatory Guide 5.65, Position C.5.1.⁵⁵

3. For design certification (DC) reviews, the development of the security plan is the responsibility of the applicant referencing the certified design. Security information presented in the DC applicant's SSAR is considered acceptable if the SSAR, including the inspections, tests, analyses, and acceptance criteria (ITAAC) and combined license (COL) action items, conforms with the above requirements.⁵⁶

Implementation of the physical security program should be accomplished 1 to 2 months (recent licensing actions have required at least 60 days)⁵⁷ before fuel loading. Security features required for new fuel in storage prior to loading of the first unit should be implemented as of the time fuel is onsite.

Technical Rationale.⁵⁸

The technical rationale for application of the above acceptance criteria to physical security is discussed in the following paragraphs.

1. 10 CFR 25, if applicable, establishes the requirements and procedures for access authorization to information classified as Secret, Confidential National Security Information, and/or Restricted Data, and includes requirements for the granting of "L" and "Q" clearances. The physical security plan must establish the administrative and physical controls regarding personnel access to certain areas and facilities, and to certain categories of information. If a licensee has classified information, the appropriate access controls, including authorizations, must be established to ensure the protection of the information. Compliance with the requirements of 10 CFR 25 provides assurance that only personnel that have been properly investigated, authorized, and have a need to know, will be able to access the classified information.
2. 10 CFR 26 establishes the requirements for fitness-for-duty programs with an objective of providing assurance that licensee personnel are not under the influence of any substance, or mentally or physically impaired from any cause, which may adversely effect their ability to safely and competently perform their duties. The fitness-for-duty program is an element of the security plan that controls personnel access to the facility.

Compliance with 10 CFR 26 provides assurance that individuals impaired through the use of legal or illegal substances, or otherwise mentally or physically impaired, will not adversely effect the safety of the nuclear power plant by sabotage or inadvertent actions.

3. 10 CFR 50.34(c) requires that license applications to operate a production or utilization facility include a physical security plan that addresses vital equipment, vital areas, isolation zones and compliance with requirements of 10 CFR 73 and other applicable requirements relevant to physical security of the facility and special nuclear materials. See the Technical Rationale for 10 CFR 73.55, below.
4. 10 CFR 50.34(d) requires that license applications to operate a production or utilization facility must include a safeguards contingency plan in accordance with the criteria of 10 CFR 73, Appendix C. See the Technical Rationale for 10 CFR 73, Appendix C, below.
5. 10 CFR 50.54(p) establishes as a condition of all licenses issued by the Commission, that safeguards contingency plan procedures be developed and maintained for effecting the actions and decisions of the responsible organizations as described in the plan. This SRP section reviews the safeguards contingency plan. Compliance with 10 CFR 50.54(p) provides assurance that procedures are developed to provide a structured, disciplined, and organized approach to execution of the safeguards contingency plan in response to perceived dangers to the facility, personnel, or special nuclear material as described in the plan.
6. 10 CFR 73.21 establishes the requirements for the protection of Safeguards Information. The physical security plan, safeguards contingency plan, and any elements of the guard training and qualification plan that disclose information related to the physical security system or response procedures are considered Safeguards Information. The unauthorized disclosure of this information could compromise the ability of the security organization to provide an appropriate level of protection against, and response to, threats, theft and radiological sabotage. Compliance with 10 CFR 73.21 provides assurance that Safeguards Information is protected against unauthorized disclosure, thereby ensuring the continued ability to protect the facility or special nuclear material and thus the health and safety of the public.
7. 10 CFR 73.55 establishes the detailed requirements for development and implementation of a physical security plan. The physical security plan defines the administrative and physical measures that provide protection of the facility, and any associated special nuclear material, from both internal and external threats. Compliance with 10 CFR 73.55 provides a high degree of assurance that the plant is protected against theft of nuclear material or radiological sabotage.
8. 10 CFR 73.56 establishes the requirements for the development and implementation of a program, as part of the physical security plan, for granting individuals unescorted access to protected and vital areas. The physical security plan is reviewed under this SRP section. Compliance with 10 CFR 73.56 provides a high degree of assurance that individuals granted unescorted access are trustworthy and reliable and do not constitute an unreasonable risk to commit radiological sabotage.

9. 10 CFR 73.57 establishes the requirements for performing criminal history checks of individuals granted unescorted access to a nuclear power facility, special nuclear material, or Safeguards Information. The performance of the criminal background investigation is an additional element of the security program used to determine if an individual should be granted unescorted access to a nuclear facility, special nuclear material, or Safeguards Information. Access control is reviewed in this SRP section as part of the physical security plan. Compliance with 10 CFR 73.57 provides protection of the facility against individuals that may pose a threat of theft of nuclear material or radiological sabotage.
10. 10 CFR 73, Appendix B, establishes the requirements for selection, training, qualification and equipping of security personnel responsible for the protection of nuclear facilities against acts of radiological sabotage. Security personnel qualified in accordance with Appendix B are an integral part of the physical security plan required by 10 CFR 73.55 and reviewed under this SRP section. Compliance with the requirements of 10 CFR 73, Appendix B, ensures that the security personnel are adequately prepared to identify, respond to, and repel threats to the nuclear facility and/or material, thus providing assurance against radiological sabotage that may impact the health and safety of the public.
11. 10 CFR 73, Appendix C, establishes the requirements for a safeguards contingency plan. The safeguards contingency plan is a documented plan to give guidance to licensee personnel to provide response to threats, thefts, or radiological sabotage relating to nuclear facilities. The safeguards contingency plan is an integral part of the response capabilities and requirements of the physical security plan developed in accordance with 10 CFR 73.55 and reviewed under this SRP section. Compliance with 10 CFR 73, Appendix C, provides assurance that the licensee is adequately prepared to respond to perceived dangers of nuclear material theft or radiological sabotage.
12. 10 CFR Part 75, if applicable, establishes requirements for material accountability and control in accordance with agreements between the NRC, Agreement States, and the International Atomic Energy Agency (IAEA). The establishment of a system for IAEA safeguards provides the IAEA with the capability to independently monitor, inspect, and verify special nuclear material inventories and controls to provide assurance that the material is accounted for and controlled in accordance with non-proliferation treaties and other international agreements relevant to the use of special nuclear materials. Compliance with 10 CFR 75 provides assurance, through independent verification, that special nuclear material inventories have not been altered, diverted, misplaced, or otherwise unaccounted for, and thus national and international security interests, including the health and safety of the public, are appropriately protected.
13. 10 CFR Part 95, if applicable, establishes the security and safeguards requirements for use, processing, storing, reproduction, transmittal, and handling of National Security Information or Restricted Data. The physical security plan reviewed under this SRP section establishes physical protection systems and a security organization that provide protection of nuclear material and related information from compromise. Compliance with 10 CFR 95 provides assurance that sensitive information is appropriately protected

against theft and misuse that could potentially threaten national security, the facility itself and/or the health and welfare of the public.

III. REVIEW PROCEDURES

At the PSAR stage, the review consists of a careful examination of the information submitted and comparison with the acceptance criteria set forth in subsection II above. The general plant description in Chapter 1 and site- related information in Chapter 2 of the PSAR should be examined to determine if there are unique features that should be considered in establishing the physical protection program. It will be desirable at this stage to discuss the formulation of this program with the applicant.

At the FSAR stage, and for applications referencing a certified design,⁵⁹ the physical security plan is reviewed to determine its conformance with the regulations, the information requirements of subsection I above, and the acceptance criteria of subsection II above. Applicable regulations and the requirements and recommendations of industry standards (such as ANSI N18.17⁶⁰) are used as checklists for this review. The reviewers may also use appropriate Division 5 Regulatory Guides and Review Guidelines 1 through 24⁶¹ (Reference 26)⁶² to the extent they are applicable to physical protection programs at nuclear power plants. Those having potential applicability are listed in the references. It is particularly important that the reviewer assure himself⁶³ that all items of vital equipment are contained within vital areas. Site visits by the reviewers are necessary, during the construction phase, before the evaluation of the plan can be completed. Upon completion of the installation of the security equipment, a confirmatory site visit is made approximately 3 months before the anticipated fuel loading. Only after that final confirmatory site visit is the security program approved.

In conducting the reviews for the various licensing stages described above, the reviewer will select and emphasize material from the following procedures, as may be appropriate for a particular case.⁶⁴ NUREG-0908 provides guidance and criteria for use in implementing these procedures.⁶⁵

1. The reviewer should confirm that the physical security organization is clearly defined, including established lines of authority and responsibility for management and direction of security forces. The organization should include a system for the development, revision, approval, implementation and enforcement of security procedures and have established a plan for selection, qualification and training of security personnel in accordance with the requirements of 10 CFR 73, Appendix B, and guidance contained in NUREG-0674.⁶⁶
2. The reviewer should verify that vital equipment and areas are adequately defined and that appropriate physical barriers, including isolation zones, isolation and protected area illumination, and penetration detection, have been established in accordance with the criteria of subsection II.2.b of this SRP section. NRC Guideline 17 (Reference 26) provides staff positions relative to designation of vital equipment and areas. The reviewer should verify that the reactor control room walls, floor, ceiling, doors and any windows are designed as bullet resisting. Vehicle control measures should be reviewed

to verify that adequate protection is provided against the use of a land vehicle as a bomb or as a means of gaining access to the proximity of vital areas.⁶⁷

3. The reviewer should verify that access authorization systems have been developed to provide physical and administrative control of access to protected and vital areas under emergency and nonemergency conditions in accordance with the criteria of subsection II.2.c. The reviewer should confirm that security measures are established for performing searches of individuals and vehicles, for granting escorted or unescorted access, for maintaining positive control of vital areas through the use of locking devices, alarms, and access logs, for control of locking devices, including keys and combinations, and for egress and ingress to protected and vital areas under emergency conditions. Generic Letter 87-08 (Reference 23) provides additional guidance relevant to protected and vital area access in addition to the requirements and guidance described in subsection II of this SRP section.⁶⁸

The reviewer confirms that the design of electronic locking devices for vital areas allows for mechanical override or will fail in a manner that supports emergency ingress or egress from the vital area in accordance with 10 CFR 73.55(d)(7)(ii) and Regulatory Guides 5.12 and 5.65.⁶⁹

In addition to meeting the requirements of 10 CFR 73.55(d) for access to protected and vital areas, the reviewer should evaluate the licensee's security program for compliance with requirements related to granting individuals unescorted access to the facility. The reviewer should evaluate the programs and procedures for performing background investigations, psychological, and behavioral evaluations per 10 CFR 73.56 and the guidance in Regulatory Guide 5.66; for performing criminal history checks in accordance with 10 CFR 73.57; and for implementation of fitness-for-duty testing and evaluations in accordance with 10 CFR 26.⁷⁰

4. The reviewer should verify that the central and secondary alarm stations, associated power supplies, and alarm system design are in accordance with the acceptance criteria of subsection II.2.d.⁷¹
5. The reviewer should verify that the communications systems are designed such that facility security personnel and local law enforcement authorities are capable of maintaining continuous communication with an individual in each continuously manned alarm station. Communication systems controlled by the licensee and required in accordance with the acceptance criteria in subsection II.2.e should terminate in each continuously manned alarm station. The reviewer shall confirm that the communications systems and devices will not adversely effect the operation of facility instrumentation and control circuits.⁷²
6. The reviewer should verify that the licensee has established testing, maintenance and audit programs in accordance with the criteria in subsection II.2.f to ensure equipment operability and the continued effectiveness of the overall security programs, including those for access authorization and fitness for duty.⁷³

7. The reviewer should verify that the licensee has established appropriate security response measures and capabilities including a safeguards contingency plan and liaisons with local law enforcement. The security force immediately available at the facility to fulfill the response requirements should nominally be 10 guards, or other armed, trained, and qualified personnel. The reviewer shall verify that methods are established (e.g., closed circuit television) to observe the isolation zone and protected area perimeter boundary to facilitate initial response to, and assessment of, any threat of penetration without exposing responding personnel to possible attack.⁷⁴
8. The reviewer should evaluate the safeguards contingency plan in accordance with the criteria in subsections II.2.g and II.2.h of this SRP Section. In addition, the reviewer should give consideration to the provisions in the plan specific to vehicle control measures in accordance with the staff requirements and guidance in Generic Letter 89-07 and its supplement (References 24 and 25).

The reviewer should verify that provisions have been established for the performance of independent audits of the safeguards contingency plan in accordance with the criteria in subsection II.2.h.⁷⁵
9. The reviewer should verify that the licensee has established measures for the protection of Safeguards Information in accordance with the acceptance criteria in subsection II.F of this SRP section. The protective measures should specifically address the production, storage, access, use, dissemination, reproduction, and destruction of Safeguards Information.⁷⁶
10. For new applications, the reviewer should verify that the applicant or licensee has performed an analysis of sabotage vulnerability to threats from both insiders and outsiders. Insights from this analysis should be reflected in the physical design and operating procedures of the facility (Reference 13). Additional information relevant to sabotage vulnerability is provided in NUREG-1267 (Reference 22).⁷⁷

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.⁷⁸

IV. EVALUATION FINDINGS

The evaluation finding at the for a PSAR review stage⁷⁹ should be substantially equivalent to the following statement:

The applicant has provided a general description of plans for protecting the plant against potential acts of radiological sabotage. Provisions for the screening of employees at the plant, and for design phase review of plant layout and protection of vital equipment have

been described and conform to 10 CFR Part 73, §73.55. We find there is reasonable assurance that the final physical security plan will meet the requirements of 10 CFR Part 25, 10 CFR Part 73, and 10 CFR Part 95 by conforming to regulatory positions in regulatory guides or equivalent guidance. We conclude that the applicant's arrangements for protection of the plant against acts of radiological sabotage are satisfactory for this stage of the licensing process.

For design certification reviews, the finding should state that the design as set forth in the standard safety analysis report adequately describes the plant layout and protection of vital equipment in accordance with 10 CFR 73.55 and applicable regulatory guidance, and provides reasonable assurance that the plant design will provide adequate protection against acts of radiological sabotage. The findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, test, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.⁸⁰

The evaluation finding ~~at the~~ for a FSAR review stage, and for applications referencing a certified design,⁸¹ should be substantially equivalent to the following statement:

The applicant has submitted a comprehensive physical security plan for the protection of the plant against potential acts of radiological sabotage. This plan has been withheld from public disclosure pursuant to 10 CFR Part 2, §2.790(d).

This plan has been reviewed, found to contain all features considered essential for such a program by the staff, and is acceptable. In particular, it has been found to comply with the Commission's regulations including 10 CFR Part 26,⁸² 10 CFR Part 50, §50.34(c) and (d)⁸³, 10 CFR Part 25, 10 CFR Part 75, 10 CFR Part 95, applicable sections of 10 CFR Part 73, ~~§73.55 and Part 73~~, including⁸⁴ Appendix B and Appendix C, and conforms to the applicable regulatory positions set forth in rRegulatory gGuides 5.12, 5.44, 5.54, 5.65, 5.66 and 5.68.⁸⁵

V. IMPLEMENTATION

The following ~~references are~~⁸⁶ intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.⁸⁷ Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.⁸⁸

Implementation schedules for conformance to parts of the methods discussed herein are contained in the referenced regulations and regulatory guides.⁸⁹

VI. REFERENCES⁹⁰

71. 10 CFR Part 2, §2.790(d)(1), "~~Security Measures Exempt from Disclosure.~~"⁹¹
2. 10 CFR Part 8, §8.5, "Interpretation by the General Counsel of §73.55 of this Chapter; Illumination and Physical Search Requirements."⁹²
93. 10 CFR Part 25, "Access Authorization for Licensee Personnel."
4. 10 CFR Part 26, "Fitness for Duty Programs."⁹³
35. 10 CFR Part 50, §50.34(c), "Physical Security Plan."
46. 10 CFR Part 50, §50.34(d), "Safeguards Contingency Plan."
57. 10 CFR Part 50, §50.54(p), "~~Safeguards Contingency Plan Procedures.~~"⁹⁴
68. 10 CFR Part 50, §50.70(b)(3), "~~Immediate Unfettered Access.~~"⁹⁵
49. 10 CFR Part 73, "Physical Protection of Plants and Materials.," (Sections §73.2, §73.21, §73.55, §73.56, and §73.57).⁹⁶
210. 10 CFR Part 73, Appendixes B and C.
811. 10 CFR Part 75, "Safeguards on Nuclear Material - Implementation of US/IAEA Agreement."
1012. 10 CFR Part 95, "Security Facility Approval and Safeguarding of National Security Information and Restricted Data."
13. Federal Register 50 FR 32138, 10 CFR 50, "Policy Statement on Severe Reactor Accidents Regarding Future Designs and Existing Plants", August 8, 1985.⁹⁷
114. Regulatory Guide 5.12, "General Use of Locks in the Protection and Control of Facilities and Special Nuclear Material."
12. ~~Regulatory Guide 5.20, "Training, Equipping and Qualifying of Guards and Watchmen."~~⁹⁸
1315. Regulatory Guide 5.44, "Perimeter Intrusion Alarm Systems."
1416. Regulatory Guide 5.54, "Standard Format and Content of Safeguards Contingency Plans for Nuclear Power Plants."
17. Regulatory Guide 5.65, "Vital Area Access Controls, Protection of Physical Security Equipment, and Key and Lock Controls."⁹⁹

18. Regulatory Guide 5.66, "Access Authorization Program for Nuclear Power Plants."¹⁰⁰
19. Regulatory Guide 5.68, "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants."¹⁰¹
- ~~15. NUREG-0207, "Interim Format and Content for a Physical Security Plan for Nuclear Power Plants."¹⁰²~~
- ~~16. NUREG-0219, "Nuclear Security Personnel for Power Plants."¹⁰³~~
- ~~17. NUREG-0220, "Interim Acceptance Criteria for a Physical Security Plan for Nuclear Power Plants."¹⁰⁴~~
- ~~18. NUREG-0416, "Security Plan Evaluation Report."¹⁰⁵~~
1920. NUREG-0674, "Security Personnel Training and Qualification Criteria." May 1980¹⁰⁶
21. NUREG-0908, "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans," August 1982.¹⁰⁷
22. NUREG-1267, "Technical Resolution of Generic Safety Issue A-29, Nuclear Power Plant Design for Reduction of Vulnerability to Industrial Sabotage," September 1989.¹⁰⁸
23. NRC Letter to All Power Reactor Licensees, "Implementation of 10 CFR 73.55 Miscellaneous Amendments and Search Requirements (Generic Letter 87-08)," May 11, 1987.¹⁰⁹
24. NRC Letter to "Power Reactor Safeguards Contingency Planning for Surface Vehicle Bombs (Generic Letter 89-07)," April 28, 1989.¹¹⁰
25. NRC Letter to All Licensees of Operating Plants, Applicants for Operating Licenses, and Holders of Construction Permits, "Supplement 1 to Generic Letter 89-07, "Power Reactor Safeguards Contingency Planning for Surface Vehicle Bombs"," August 21, 1989.¹¹¹
- ~~2026.~~ Review Guidelines 1 through 24.¹¹²
- ~~2127.~~ ANSI N18.17-1973¹¹³, "Industrial Security for Nuclear Power Plants."¹¹⁴

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SRP Draft Section 13.6
Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

Item	Source	Description
1.	Current PRB names and abbreviations.	Editorial change made to reflect current PRB name and abbreviation for SRP Section 13.6.
2.	Current PRB names and abbreviations.	Editorial change made to reflect that no secondary review branch has been designated for SRP Section 13.6.
3.	Editorial, 10 CFR 52 Applicability	The text was modified to remove the word "stage." The use of the word "stage" infers that a PSAR review is a required step, which is not the case for applications submitted in accordance with the requirements of 10 CFR 52.
4.	10 CFR 52 Applicability	Added a paragraph to the Areas of Review describing the scope of review for design certifications. The addition of this paragraph is consistent with the existing content that describes the PSAR and FSAR review stages. The design certification paragraph was not incorporated with the PSAR discussion because the PSAR review only involves review of preliminary plans for implementing security measures as opposed to the design certification review of actual design features.
5.	10 CFR 52 Applicability, Editorial	Added text to the Areas of Review to incorporate reviews performed in accordance with 10 CFR 52. An applicant referencing a certified design must develop a site specific security program that includes the detailed physical security plan, security personnel qualification plan, and safeguards contingency plan. This is consistent with the existing SRP discussion of the FSAR review stage, and therefore the review for applicants referencing a certified design has been incorporated into the paragraph describing the FSAR review. In addition, to be consistent with the changes to the paragraph on PSAR reviews and the requirements of 10 CFR 52, the text was modified to remove the word "stage".
6.	Editorial	The title upper case letters in "Guard Training Qualification Plan" were set to lower case and the word "and" was added between training and qualification. There is no specific requirement that the plan required under 10 CFR 73, Appendix B, be titled as stated.
7.	Editorial	Added "safeguards" prior to "contingency plan" and changed "Contingency Plan" to lower case for consistency with similar citations of the safeguards contingency plan throughout the SRP section.
8.	Editorial	Corrected "describes" to be non-plural.

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Item	Source	Description
9.	Editorial	Deleted extraneous comma
10.	Editorial	Numbered and indented the paragraph on local law enforcement response capabilities to associate it with the paragraph beginning with "Specific information to be reviewed..."
11.	Current PRB names and abbreviations.	Editorial change made to reflect that no secondary review branch has been designated for SRP Section 13.6.
12.	SRP-UDP format item	Added "Review Interface" subsection to Areas of Review, including introductory sentence, in accordance with SRP-UDP guidance.
13.	PI Nos. 25429 and 25430.	Added a review interface with SRP Section 14.2 for review of initial testing of security systems. This review interface is based on discussions in Section 14.2 of the ABWR and more notably the CE 80+ FSERs. Existing SRP Sections 13.6 and 14.2 do not adequately address initial or startup testing of plant security systems. Changes are proposed to add initial testing requirements to SRP Section 14.2 based on the FSERs. Given the proposed changes to SRP Section 14.2, it is appropriate to add a review interface with SRP Section 13.6.
14.	PI #25596 , Editorial	A review interface was added for SRP Section 9.5.2 regarding review of communications systems. Although the security communication system is reviewed in accordance with the criteria of SRP Section 13.6, certain aspects of the system, primarily the compatibility/interference with operation of other plant systems, is reviewed as part of SRP Section 9.5.2. (Also see Integrated Impact #385, SRP Section 9.5.2)
15.	Integrated Impact 840.	Added a Review Interface with SRP Section 19.1 with regard to review of sabotage vulnerabilities identified by the plant PRA.
16.	Editorial	The Acceptance Criteria subsection is revised and reformatted to include a lead-in paragraph and list of applicable acceptance criteria that is typical of other SRP Sections. The purpose of this change was to clearly establish and separate those requirements considered to be Acceptance Criteria from the subordinate guidance considered to be specific criteria. There was no net change in the list of criteria from that in the existing SRP section as a result of this reformatting. New Acceptance Criteria added as a result of integrated impacts are identified by superscript numbers.

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Item	Source	Description
17.	Integrated Impact 838.	Added 10 CFR 26 to the Acceptance Criteria with regard to fitness for duty requirements for individuals with access to nuclear facilities.
18.	Editorial	Added 10 CFR 50.34(d) to the Acceptance Criteria. This regulation was previously referenced in SRP Section 13.6 but was not included in the text.
19.	Integrated Impact 837.	Added 10 CFR 50.54(p) to the Acceptance Criteria. This regulation was previously referenced in SRP Section 13.6 but was not included in the text.
20.	Integrated Impact 839.	Added 10 CFR 73.21 regarding protection of safeguards information to the list of Acceptance Criteria.
21.	Integrated Impact 838.	10 CFR 73.56 is added to the list of acceptance criteria. The staff position in the CE System 80+ FSER states that 10 CFR 73.56 and Regulatory Guide 5.66 should be used as the criteria for personnel screening in place of ANSI N18.17.
22.	Integrated Impact 838.	10 CFR 73.57 related to criminal history checks of individuals allowed unescorted access to nuclear facilities or access to safeguards information, is added to the list of acceptance criteria.
23.	Editorial	Added a typical lead-in sentence for specific acceptance criteria. This change, in conjunction with the reformatting of the individual acceptance criteria, separates the more detailed criteria from the general acceptance criteria and is consistent with other SRP sections.
24.	Editorial	Numbered the paragraphs related to the individual licensing stages to eliminate potential confusion and facilitate the referencing of individual paragraphs of the specific criteria.
25.	Editorial, 10 CFR 52 Applicability	The use of the word "stage" infers that a PSAR review is a required step, which is not the case for applications submitted in accordance with the requirements of 10 CFR 52. The text was modified to remove the word "stage" to clarify that the subject criteria applies to the review of a PSAR, if such a review required.
26.	Editorial	The paragraph describing the acceptance criteria applicable to the PSAR was revised to utilize the new list of primary Acceptance Criteria. Although the criteria have been rearranged, there was no overall change to the acceptance criteria for the PSAR review.

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Item	Source	Description
27.	Editorial	The existing criteria related to 10 CFR 25, 73, and 95 were deleted because they redundant to the criteria listed in the newly developed list of Acceptance Criteria.
28.	Editorial	Revised the numbering and order of the criteria to reflect the hierarchy of the regulatory documents and to replace numbers with letters to avoid confusion with the numbered acceptance criteria when referencing or citing the subject paragraphs.
29.	Editorial	Added a brief description of the applicability of 10 CFR 50.70(b)(3).
30.	Editorial	Added a brief description of the applicability of Regulatory Guide 5.12.
31.	Editorial	Added a brief description of the applicability of Regulatory Guide 5.44.
32.	Integrated Impact 838.	Regulatory Guide 5.66 is added to the list of acceptance criteria in place of ANSI N18.17 based on a staff position in the CE 80+ FSER.
33.	Editorial	Added a brief description of the applicability of NUREG-0674.
34.	Integrated Impact 821 , Reference Verification.	Deleted Regulatory Guide 5.20 as acceptance criteria based on NUREG-0908 which states the Regulatory Guide is superseded by 10 CFR 73, Appendix B. A call with the NRC confirmed that the Regulatory Guide can be deleted and that 10 CFR 73, Appendix B and NUREG-0674 provide the appropriate criteria.
35.	Integrated Impact 821.	Added NUREG-0908 as specific criteria to the Acceptance Criteria subsection of SRP Section 13.6.
36.	Editorial, 10 CFR 52 Applicability	To be consistent with the changes to the paragraph on PSAR reviews and the requirements of 10 CFR 52, the text was modified to remove the word "stage" to clarify that the subject criteria applies to the review of a FSAR.
37.	Editorial	The paragraph describing the acceptance criteria applicable to the FSAR was revised to utilize the new list of primary Acceptance Criteria. Although the criteria have been rearranged, there was no overall change to the acceptance criteria for the FSAR review.
38.	Integrated Impact 1313 , SRP-UDP standards citation update	Consideration should be given to updating the citation of ANSI N18.17 pending the review and approval of the associated standard comparison.
39.	SRP-UDP format item, Reformat References	Added parenthetical identification of reference for ANSI N18.17.

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Item	Source	Description
40.	Editorial	The paragraph was revised to delete discussion of "specific criteria" because it is redundant to preceding changes that added a typical lead-in sentence for the specific criteria portion of Subsection II.
41.	Editorial	Replaced "his" with "the" to make the sentence gender neutral.
42.	Editorial.	Relocated and revised text from previous paragraph II.h to incorporate 10 CFR 73, Appendix B, in the discussion of the physical security organization.
43.	Integrated Impact 821.	Added discussion identifying NUREG-0674 and -0908 as providing additional guidance with regard to the compliance with the physical security organizational requirements of 10 CFR 73.55.
44.	Integrated Impact 831.	Added additional criteria and guidance relevant to the review of physical barriers.
45.	Integrated Impact 832.	Added packages and vehicles to the specific criteria related to search requirements to be consistent with 10 CFR 73.55(d)(2), (3), and (4).
46.	Integrated Impact 832.	Revised the Acceptance Criteria related to protected and vital area access requirements to be more complete with regard to the cited paragraph's [§73.55(d)] requirements and to incorporate other relevant requirements and guidance.
47.	Integrated Impact 833.	Revised the Acceptance Criteria related to detection aids requirements to be more complete with regard to the cited paragraph's [§73.55(e)] requirements and to incorporate other relevant requirements and guidance.
48.	Editorial	Added comma to correct the sentence punctuation.
49.	Integrated Impact 834.	Revised the Acceptance Criteria related to communication requirements to be more complete with regard to the cited paragraph's [§73.55(f)] requirements.
50.	Integrated Impact 835.	Revised the Acceptance Criteria related to testing and maintenance requirements to include reference to guidance in Regulatory Guide 5.44.
51.	Integrated Impact 835.	Revised the Acceptance Criteria related to testing and maintenance requirements to be more complete with regard to the cited paragraph's [§73.55(g)] requirements and to incorporate other relevant requirements and guidance.
52.	Integrated Impact 836.	Revised the Acceptance Criteria related to response requirements to be more complete with regard to the cited paragraph's [§73.55(h)] requirements.

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Item	Source	Description
53.	Editorial.	The specific criteria related to 10 CFR 73, Appendix B as described in the existing SRP paragraph II.h was incorporated with the specific criteria related to the physical security organization in paragraph II.1.a. This change is consistent with 10 CFR 73.55(b), which includes the requirements of 10 CFR 73, Appendix B by reference in paragraph (b)(4)(i).
54.	Editorial	Renumbered criteria to accommodate the change incorporating existing specific criteria h into specific criteria a.
55.	Integrated Impact 837.	Revised the Acceptance Criteria related to response requirements to be more complete with regard to 10 CFR 73, Appendix C requirements and to incorporate additional requirements and guidance.
56.	10 CFR 52 Applicability, PI No. 22064.	Added a paragraph to the Acceptance Criteria describing the acceptance criteria for design certifications and those applicants referencing a certified design. The addition of this paragraph is consistent with the existing content that describes the PSAR and FSAR reviews. The design certification paragraph was not incorporated with the PSAR discussion, because the PSAR review only involves review of preliminary plans for implementing security measures as opposed to the design certification review of actual design features.
57.	Integrated Impact 841.	Revised the text to change "1 to 2 months" to "at least 60 days" to incorporate the staff's position in the ABWR FSER regarding implementation of the security plan in relation to fuel loading.
58.	SRP-UDP format item, Develop Technical Rationale	Technical Rationale is a new SRP item. Technical Rationale are provided for the Acceptance Criteria listed in Subsection II. of the SRP and include 10 CFR 25, 26, 50, 73, 75, and 95 or subparts thereof.
59.	10 CFR 52 Applicability	To address reviews performed in accordance with 10 CFR 52, mention of applicants referencing a certified design was added to the review discussion applicable to FSARs since the level of review is similar.
60.	Integrated Impact 1313 , SRP-UDP standards citation update, Editorial	Consideration should be given to updating the citation of ANSI N18.17 pending the review and approval of the associated standard comparison. Also corrected the citation to read "N18.17."

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Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
61.	SRP-UDP format item, Reference Verification, Unverified References	With the exception of Review Guideline 17, the SRP Section 13.6 reference to Review Guidelines 1 through 24 could not be verified as these references were not available. Guideline 17 regarding the designation of vital areas and equipment is cited in both the CE 80+ and ABWR FSERs.
62.	SRP-UDP format item, Reformat References	Added parenthetical reference identification to the existing citation of Review Guidelines 1-24.
63.	Editorial	The word "himself" was deleted to make the SRP gender neutral.
64.	Editorial.	Added lead-in sentence for specific review procedures that is typical of other SRP sections.
65.	Integrated Impacts 821, 831, 832, 833, 834, 835.	Added reference to NUREG-0908 for guidance and criteria relevant to performance of the review procedures. The reference to the NUREG was added to the lead-in paragraph because it applies to most, if not all, of the review procedures listed.
66.	Integrated Impact 821 , Verification of References	Added a new Review Procedure related to Acceptance Criteria for the physical security organization.
67.	Integrated Impact 831.	Added a new Review Procedure related to Acceptance Criteria for physical barriers.
68.	Integrated Impact 832.	Added a new Review Procedure related to Acceptance Criteria for protected and vital area access.
69.	Integrated Impact 832.	Added review procedures specific to the design of vital area locking devices to allow emergency ingress and egress.
70.	Integrated Impact 838.	Added new Review Procedure related to Acceptance Criteria for individual access requirements as described in 10 CFR 26, 73.56, and 73.57.
71.	Integrated Impact 833.	Added a new Review Procedure related to the Acceptance Criteria for detection aids.
72.	Integrated Impact 834.	Added a new Review Procedure related to the Acceptance Criteria for communications.
73.	Integrated Impact 835.	Added new Review Procedure related to Acceptance Criteria for security program testing, maintenance and auditing.
74.	Integrated Impact 836.	Added new Review Procedure related to Acceptance Criteria for security response requirements.
75.	Integrated Impact 837.	Added new Review Procedure related to Acceptance Criteria for safeguards contingency plan requirements.

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Item	Source	Description
76.	Integrated Impact 839.	Added new Review Procedure related to Acceptance Criteria for protection of Safeguards Information.
77.	Integrated Impact 840.	Added a new Review Procedure related to sabotage vulnerability analyses. These analyses are discussed in the Commission's Policy Statement on severe accidents and were reviewed by the staff for the CE 80+ and ABWR designs..
78.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard paragraph to address application of Review Procedures in design certification reviews.
79.	Editorial, 10 CFR 52 Applicability	The text was modified to remove the word "stage." The use of the word "stage" infers that a PSAR review is a required step, which is not the case for applications submitted in accordance with the requirements of 10 CFR 52.
80.	10 CFR 52 Applicability	The standard paragraph regarding design certification reviews per 10 CFR 52 was added in accordance with SRP-UDP guidance, and modified to briefly describe the appropriate findings.
81.	10 CFR 52 Applicability, Editorial	To address reviews performed in accordance with 10 CFR 52, mention of applicants referencing a certified design was added to the evaluation findings applicable to FSARs since the findings should be similar. In addition, to be consistent with the changes to the paragraph on PSAR reviews and the requirements of 10 CFR 52, the text was modified to remove the word "stage".
82.	Integrated Impact 838.	Added 10 CFR 26 regarding fitness for duty programs to the Evaluation Findings for FSAR and COL licensing stages.
83.	Editorial	Added reference to 10 CFR 50.34(d) in the Evaluation Findings. This paragraph of 10 CFR 50.34 involves the requirement for a safeguards contingency plan and is referenced in the existing SRP section, but was excluded from the text. 10 CFR 50.34 (d) has been added to the Acceptance Criteria and its inclusion in the evaluation findings along with 10 CFR 50.34(c) is appropriate.
84.	Editorial	Numerous sections of 10 CFR 73 have been added as a result of integrated impacts for this SRP section. The deletion allows general reference to 10 CFR 73, which will encompass the newly added sections, and any potential future additions from 10 CFR 73 that might apply to these findings.
85.	Editorial.	Clarified the last sentence of the Evaluation Findings to cite the specific Regulatory Guides that are identified in the SRP section as applicable to the review.

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Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
86.	Editorial	Revised the lead sentence to be consistent with other SRP sections.
87.	SRP-UDP Format Item.	Added boiler-plate change to implementation section to identify that the SRP guidance is applicable to the 10 CFR 52 licensing process.
88.	SRP-UDP Format Item.	Added boiler-plate statement regarding the applicability of the revised SRP section to existing or new license applications and amendments.
89.	Editorial	Added a third paragraph regarding implementation schedules to be consistent with other SRP sections.
90.	Editorial	Relocated and renumbered the References in accordance with the document hierarchy and to accommodate the addition and deletion of references.
91.	SRP-UDP format item, Verification of References	10 CFR 2.790(d)(1) does not contain a title.
92.	Integrated Impact 831.	Added reference to 10 CFR 8.5 which was added as specific criteria in Subsection II, paragraph II.b related to physical barrier requirements.
93.	Integrated Impact 838.	Added reference to 10 CFR 26 regarding fitness for duty programs.
94.	SRP-UDP format item, Verification of References	10 CFR 50.54(p) does not contain a title.
95.	SRP-UDP format item, Verification of References	10 CFR 50.70(b)(3) does not contain a title.
96.	Editorial, Integrated Impacts 831, 835, 838, 839.	Identified the specific sections of 10 CFR 73 that are cited in, and relevant to, SRP Section 13.6.
97.	Integrated Impact 840.	Added reference to the NRC's severe accident policy statement, which has been incorporated in the Acceptance Criteria for SRP Section 13.6.
98.	Integrated Impact 821 , Reference Verification.	Deleted reference to Regulatory Guide 5.20 based on NUREG-0908 which states the Regulatory Guide is superseded by 10 CFR 73, Appendix B. A call with the NRC confirmed that reference to the Regulatory Guide can be deleted and that 10 CFR 73, Appendix B and NUREG-0674 provide the appropriate criteria.
99.	Integrated Impact 831.	Added reference to Regulatory Guide 5.65 which was added as specific criteria in Subsection II with regard to physical barrier requirements.
100.	Integrated Impact 838.	Added reference to Regulatory Guide 5.66 related to implementation of access requirements per 10 CFR 73.56.

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Item	Source	Description
101.	Integrated Impact 831.	Added reference to Regulatory Guide 5.68, which has been added to Acceptance Criteria related to physical barriers and vehicle control measures.
102.	SRP-UDP format item, Verification of References	The reference to NUREG-0207 could not be verified as being applicable to current reviews of security plans. The NUREG is not cited within the text of SRP Section 13.6 nor is it cited with regard to reviews of evolutionary designs in the CE 80+ and ABWR FSERs. RECALL searches failed to identify any regulatory references (e.g., Regulatory Guides) to the NUREG with the exception of the SRP citation.
103.	SRP-UDP format item, Reference Verification	NUREG-0219 is not cited within the text of SRP Section 13.6 and therefore has been deleted. However, NUREG-0219 is cited within NUREG-0908, which has been added to the section by numerous integrated impacts, and thus may still be used in the review of security programs as deemed appropriate by the reviewer.
104.	SRP-UDP format item, Verification of References	The reference to NUREG-0220, "Interim Acceptance Criteria for a Physical Security Plan for Nuclear Power Plants," could not be verified as being applicable to current reviews of security plans. The NUREG is not cited within the text of SRP Section 13.6 nor is it cited with regard to reviews of evolutionary designs in the CE 80+ and ABWR FSERs. With the exception of the SRP citation, RECALL searches identified only one other regulatory citation to the NUREG. This citation, in 10 CFR 8.5, involves an interpretation of requirements in 10 CFR 73.55 and this interpretation was promulgated by notice in the June 1977 Federal Register. The interpretation in 10 CFR 8.5 makes reference to "forthcoming revisions to NUREG-0220". Subsequent to this interpretation, NUREG 0908, "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans," was issued in August 1982. Based on the similarity of the titles, NUREG-0220 may have been superseded by NUREG 0908.
105.	SRP-UDP format item, Verification of References	With the exception of references in NRC inspection manual procedures, the reference to NUREG-0416 could not be verified through RECALL or NUDOCs searches and was not available through accessible library resources. The NUREG is not cited within the text of SRP Section 13.6.
106.	SRP-UDP format item, Verification of References	Added the publishing date to the reference for NUREG-0674.
107.	Integrated Impacts 821, and 831-835.	Added reference to NUREG-0908 which has been added to the Acceptance Criteria and Review Procedures.

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Item	Source	Description
108.	Integrated Impact 840.	Added reference to NUREG-1267 related to new Acceptance Criteria and Review Procedures for sabotage vulnerability analyses.
109.	Integrated Impact 832.	Added reference to Generic Letter 87-08 which has been added to the Review Procedures.
110.	Integrated Impact 837.	Added reference to Generic Letter 89-07 regarding requirements for vehicle control related to vehicles used as explosive devices.
111.	Integrated Impact 837.	Added reference to Generic Letter 89-07, Supplement 1, regarding requirements for vehicle control related to vehicles used as explosive devices.
112.	SRP-UDP format item, Reference Verification, Unverified References	With the exception of Review Guideline 17, the SRP Section 13.6 reference for Review Guidelines 1 through 24 could not be verified as these references were not available. Guideline 17 regarding the designation of vital areas and equipment is cited in both the CE 80+ and ABWR FSERs.
113.	Integrated Impact 1381.	Revised the non-date-specific standard citation of ANSI N18.17 to cite the version in effect when the SRP was published.
114.	Integrated Impact 1313, SRP-UDP standards citation update	Consideration should be given to updating the citation of ANSI N18.17 pending the review and approval of the associated standard comparison.

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SRP Draft Section 13.6
Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
733	RG 5.20 is cited in this SRP Section. NRA Target 1976 is endorsed by RG 5.20. The latest version of this standard is NRA Target 1992.	This is a placeholder II. This impact will not be processed further. Action will be tracked by IPD-7.0 Form 13.6-5.
734	RG 5.44 is cited in this SRP Section. Factory Mutual is endorsed by RG 5.44 with no date specified. The latest version of this standard is Factory Mutual 1990.	This impact will not be processed further. Action will be tracked by IPD-7.0 Form 13.6-4.
821	Revise Acceptance Criteria and develop Review Procedures for review of the physical security organization.	II, III, and VI
831	Revise Acceptance Criteria and develop Review Procedures for review of physical barriers, vital areas, isolation zones and lighting.	II, III, and VI
832	Revise Acceptance Criteria and develop Review Procedures for review of access requirements.	II, III, and VI
833	Revise Acceptance Criteria and develop Review Procedures for review of detection aids.	II, III, and VI
834	Develop Review Procedures for review of communication systems.	II, III, and VI
835	Revise Acceptance Criteria and develop Review Procedures for review of testing and maintenance programs and program reviews.	II, III, and VI
836	Develop Review Procedures for review of response capabilities and law enforcement liaisons.	II, and III
837	Revise Acceptance Criteria and develop Review Procedures for review of licensee safeguards contingency plans.	II, III, and VI
838	Develop Acceptance Criteria and Review Procedures for review of personnel access and fitness for duty programs.	II, III, IV, and VI
839	Develop Acceptance Criteria and Review Procedures for review of controls on safeguards information.	II, III, and VI
840	Develop Acceptance Criteria and Review Procedures for review of sabotage vulnerabilities of evolutionary reactors.	II, III, V, and VI
841	Revise the Acceptance Criteria discussion regarding implementation of the physical security program prior to fuel loading.	II
1313	Revise the Acceptance Criteria to cite the latest version of ANSI N18.17.	This is a placeholder integrated impact and will not be processed further.

SRP Draft Section 13.6
Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
1314	Revise Regulatory Guide 1.70 to delete the reference to Regulatory Guide 1.17.	This integrated impact will not be processed further. Action will be tracked by IPD 7.0 form 13.6-6.
1315	Amend 10 CFR 73, Appendix B, to update the standard citation for ANSI S3.6.	This integrated impact will not be processed further. Action will be tracked by IPD 7.0 form 13.6-7.
1381	Update the non-date-specific citation of ANSI N18.17 to cite the 1973 version.	VI